

## **REMARKS**

### **I. Summary of Office Action**

In the Office Action mailed on January 26, 2006, the Examiner rejected claims 1, 2, 22, and 23 under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent Application Pub. No. 2004/0208596A1 (Bringans). Further, the Examiner rejected claims 3-6 under 35 U.S.C. § 103(a) as being allegedly unpatentable by Bringans in view of U.S. Patent Application Pub. No. 6660988B2 (Lee). In addition, the Examiner noted that claim 23 depends on cancelled claim 7.

### **II. Status of the Claims**

By this response, Applicants have amended claims 1 and 23. Now pending in this application are claims 1-6 and 22-23, of which claim 1 is independent, and the remaining are dependent.

As suggested by the Examiner, claim 23 has been amended to depend on dependent claim 22.

The invention as claimed in each of claims 1-6 and 22-23 includes a system for detecting incoming light from a remote laser source in which the remote laser source is unrelated to the system detecting incoming light. The light detection system comprises (i) a first array having a plurality of lenses positionable using actuators, (ii) a second array having a plurality of opto devices operable to detect incoming light from the said remote laser source in which said remote laser source originates from source target unrelated to the system for detecting incoming light and (iii) at least one processor in communication with at least one actuator of the plurality of actuators and at least one opto device of the plurality opto devices.

### III. Response to Rejections

#### a. Response to 35 U.S.C. § 102(e) Rejection of Claims 1, 2, 22, and 23

The Examiner rejected claims 1, 2, 22, and 23 under 35 U.S.C. § 102(e) as being anticipated by Bringans. Of these claims, claim 1 is independent and the remaining are dependent.

For a reference to anticipate a claim, the cited reference must teach each and every element of the claim. MPEP § 2131. Applicants respectfully traverse the rejection of claims 1, 2, 22, and 23 as amended because Bringans fails to teach each and every element of these claims. Namely, Bringans fails to teach a “remote laser source originating from a source target **unrelated** to the system for detecting incoming light.”

Bringans teaches a method of maintaining optimal light beam transmission between “two spaced-apart subsystems (e.g. two printed circuit boards) supported within a larger system (e.g. a server system).” See Abstract. From Figure 1 it is clear that a laser source system and a system for detecting the laser are related to each other having a connection to the same CPU system. See paragraph 0027 and Figure 1, 110, 111, and 113.

However, claim 1 as amended, recites a “remote laser source originating from a source target **unrelated** to the system for detecting incoming light.” As noted in the Applicants’ specification, the proposed invention may apply to a military application in which the system detecting an incoming light determines whether the incoming light is from a friendly party or from an enemy. See Summary in Applicants’ Specification. It is apparent that the laser system from an enemy cannot be related to the system on the friendly party’s side being used to detect the laser source.

As such, Bringans fails to teach each and every element of claim 1. Thus, Applicants respectfully submit that claim 1 is in condition for allowance. Claims 2, 22, and 23 as amended

include each and every limitation of claim 1. Thus, Applicants also respectfully submits that claims 2, 22, and 23 as amended are in condition for allowance as well. Favorable reconsideration is requested.

**b. Response to 35 U.S.C. § 103(a) Rejection of Claims 3-6**

The Examiner rejected claims 3-6 under 35 U.S.C. § 103(a) as being obvious over a combination of Bringans and Lee.

Under M.P.E.P. § 2143, in order to establish a *prima facie* case of obviousness of a claim over a combination of references, the Examiner must establish that the combination discloses or suggests every element recited in the claim. Applicants respectfully traverse the rejections of claims 3-6, because the combination of Bringans and Lee fails to disclose or suggest the invention as a whole as recited in any one of these claims.

Claims 3-6 all ultimately depend on claim 1 and thus include all of the limitations of amended claim 1. For the reasons set forth above, Applicants submit that Bringans fails to teach a “remote laser source originating from a source target unrelated to the system for detecting incoming light” and thus fails to teach the limitations of claim 1. Therefore, Bringans fails to teach the limitations of claims 3-6.

Further, Applicants submit that Lee fails to make up for the deficiency of Bringans. Lee teaches a method of fabricating Focal Plane Arrays (FPAs). However, Lee does not teach a “remote laser source originating from a source target unrelated to the system for detecting incoming light” such as a laser that is used for targeting purposes in the context of military applications.

Consequently, the combination of Bringans and Lee fails to disclose or suggest all of the limitations of claims 3-6, and thus a *prima facie* case for claims 3-6 has not been made.

### **CONCLUSION**

For the foregoing reasons, Applicants submit that all of the pending claims are now in condition for allowance. Applicants thus respectfully request favorable reconsideration and allowance.

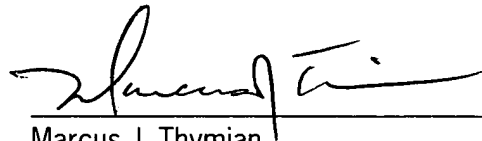
Should the Examiner wish to discuss this case with the undersigned, the Examiner is welcome to call the undersigned at (312) 935-2352.

Respectfully submitted,

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By:



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